

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Gwendolyn Anne Taylor, : CHAPTER 13
Miranda Nicole Taylor, :
Debtors : Case No. 19-10138-PMM

MOTION TO SELL REAL PROPERTY

AND now comes the Debtors, Gwendolyn Anne Taylor and Miranda Nicole Taylor, by and through their counsel, Jeremy M. Bolles, Esq., and pursuant to 11 U.S.C. §363(b)(1) and 11 U.S.C. § 1303, respectfully requests this Court to sell certain real property under the terms set forth below:

1. The Debtor desires and hereby proposes to sell the Debtors' real property commonly known as 728 Market Street, Bangor, Northampton County, Pennsylvania 18013, Tax Identification: E9NE1C 15 0102 and Parcel Identification: E9NE1C 15 0102 2015-a/256955 (the "Property").

2. On or about August 7, 2022, the Debtor entered into an Agreement of Sale and Purchase for the Property. The Agreement of Sale and Purchase is attached hereto as Exhibit "A."

3. The current contractual sale price for the Property is \$150,500.00. *See* Exhibit "A."

4. The purchaser of the Property is Bangor Mart Inc., 113 Pennsylvania Avenue, Bangor, PA 18013. *See* Exhibit "A."

5. The real estate agent is Gail Hoover of Remax Central Incorporated located at 4789 Route 309 Center Valley, Pennsylvania 18034. *See* Exhibit "B"

6. The purchaser of the Property is an independent, third-party purchaser who is not related to the Debtor by blood, marriage or business association.

7. It is believed and therefore averred that proposed purchase price is the current fair market value for this arm's length transaction.

8. The proceeds of this sale will be enough to satisfy all secured claims and liens of records attached to the Property.

9. The following sales costs, liens of records, exemptions and other expenses related to this sale are to be paid out of the sale proceeds at the time of closing in the estimated amounts below:

- a. Ordinary and reasonable settlement costs, including, but not limited to those related to notary services, deed preparation, disbursements, express shipping, surveys, municipal certifications, or any other such routine matters
- b. Liens paid at closing to satisfy secured claim of:
 - a. Nationstar Mortgage LLC d/b/a Mr. Cooper, First position Mortgage (Approximately \$74,045.36 balance) (Actual balance of this mortgage's payoff to be determined prior to closing and entire secured lien will be paid in full at the time of closing).
- c. Real estate and/or any taxes, sewer, trash and/or other such items as determined necessary to pass insurable title
- d. Property repairs, if any
- e. Real estate commissions
- f. Any small (less than \$300) allowances agreed to be made to Buyer to settle any unforeseen dispute arising at settlement

10. The amount of net sale proceeds received by the Trustee will be disbursed in accordance with 11 U.S.C. § 1325 (a)(4);

Wherefore, the Debtors, Gwendolyn Anne Taylor and Miranda Nicole Taylor, respectfully request that this Honorable Court to enter an Order permitting the sale of the Debtors' real property commonly known as 728 Market Street, Bangor, Northampton County, Pennsylvania, 18013.

Respectfully Submitted,

Date: August 24, 2022

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